

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

VELMA SUE BATES, CLAUDIA)	
BIRDYSHAW, WILLARENE FISHER,)	
MARK LONG, JON TOUNGETT,)	
CAROLYN WADE, and RICHARD WHITE)	
)	Case No.: 1:08-cv-00029
Plaintiffs,)	Judge Trauger
)	
vs.)	
)	
DURA AUTOMOTIVE SYSTEMS, INC.,)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR ATTORNEY FEES AND DISCRETIONARY COSTS

COME NOW the Plaintiffs, by and through counsel, and move this Court to award Plaintiffs' attorney fees and discretionary costs pursuant to 42 U.S.C. § 12205.

AS GROUNDS FOR THIS MOTION, the Plaintiffs would respectfully show that the Americans with Disabilities Act allow for an award of attorney's fees and discretionary costs to a successful party litigant.

The Plaintiffs, jointly and severally, seek an award in the amount of \$148,793.50 for attorneys fees and \$10,950.22 for discretionary costs, for a total assessment of \$159,743.72, to be assessed against the Defendant. This represents the total amount of attorneys fees and discretionary costs incurred by the Plaintiffs up to the jury verdict on July 19, 2011. The hourly rates are as follow: Mr. Beam \$225.00 per hour; Ms. Fecteau \$150.00 per hour; Mr. Sharp \$125.00 per hour, and support time with paralegals at \$95.00 per hour, and summer interns at \$45.00 per hour.

Attached in support of this motion are two affidavits of John A. Beam, III and a memorandum of law in support of this motion.

Respectfully Submitted,

/s/ John A. Beam, III
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion was forwarded on the date listed below via the Court's electronic filing system:

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This 28th day of July, 2011.

/s/ John A. Beam, III